



Requirements), 730.535 (Interruptions of Service) and 730.540 (Installation Requests). However, those concerns are even greater now since Mr. Riolo proposes reporting of even “more comprehensive” information. As mentioned in my direct testimony, the IITA believes that without sufficient evidence demonstrating that they will significantly increase service quality levels, any additional reporting requirements will amount to nothing more than arbitrary regulation which will subject local exchange carriers in Illinois to additional financial and administrative burden which is neither reasonable nor necessary.

As a practical matter Mr. Riolo incorrectly assumes that all of the additional information he believes should be reported is currently or may easily be collected by all local exchange carriers. To the contrary, as indicated in my direct testimony many small carriers do not currently have systems in place to collect all of the required information. By way of example, unlike the larger local exchange carriers that have their operator, business and repair office calls answered electronically, the vast majority of the smaller carriers still utilize actual live company representatives to answer such calls. Using such a manual process, it just is not feasible or even possible to measure and keep records of the answer times for customer call and repair centers as required by Staff's and Mr. Riolo's proposal.

In order to adapt to and ultimately comply with additional reporting requirements, many small carriers would have to install new office systems, perform substantial upgrades to existing office systems, add new personnel and/or train existing personnel. The costs in connection with such actions will necessarily be significant from a small carrier perspective. It is simply not reasonable to require carriers to incur such costs without any demonstration that consumers will see an equal or greater benefit from the additional requirements in the form of a significant increase in already high service quality levels.

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61 Q. Are waivers from the requirements of Code Part 730 available for companies that cannot  
62 meet them?

63 A. Yes, waivers are available pursuant to Section 730.110 in Part 730 as proposed by the  
64 Commission's Staff. However, seeking and obtaining such waivers will also require  
65 affected carriers to incur significant costs. In addition, the Commission will be burdened  
66 by addressing numerous petitions. Such costs and burden can easily be avoided if the  
67 Commission shows appropriate restraint and decides to limit reporting requirements to  
68 those absolutely required by HB 2900. Ultimately, if Code Part 730 as revised and  
69 adopted in this docket includes additional reporting requirements such as those proposed  
70 by the Staff and by Mr. Riolo, the Commission should expect a significant number of  
71 petitions for waivers to be filed by IITA member companies pursuant to section 730.110.

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73 Q. Does that complete your direct testimony?

74 A. Yes, it does.